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March 9, 2011

Ms. Sheila M. Eckman
Office of Environmental Cleanup
U.S. Environmental Protection Agency Region 10
1200 6th Avenue ECL-111
Suite 900
Seattle, WA 98101

Re: Lower Duwamish Waterway Slip 4 Interim Source Control Status Report

Dear Ms. Eckman:

Attached is Ecology's Slip 4 Interim Source Control Status Report (Status Report). This report summarizes the current status of source control for the Lower Duwamish Waterway (LDW) River Mile (RM) 2.8 East (Slip 4) source control area, also referred to as the Slip 4 Early Action Area (EAA) or EAA-3. This report was prepared by Ecology with review and comments from USEPA. Ecology has incorporated USEPA's comments into the Status Report. The primary purpose of the report is to determine if sufficient source controls have been, or will be implemented to allow for initiation of sediment cleanup at the head of Slip 4 in 2011. This is considered an interim report because some high priority source control actions have not yet been fully implemented per the 2004 Source Control Strategy. A more definitive statement regarding source control will be issued following full implementation of the source control action plan for Slip 4.

The goal of the 2004 Source Control Strategy is to minimize the potential for chemicals in sediment to exceed Ecology's Sediment Management Standards and cleanup goals for the Lower Duwamish Waterway. The strategy to achieve this goal is by using administrative and legal authorities to perform inspections and require necessary source control actions.

Some high priority source control actions have been taken under various legal and administrative authorities to minimize releases of contaminants into Slip 4. These actions have included demolition and replacement of the Georgetown Steam Plant Flume, cleaning of catch basins and line at King County International Airport (KCIA), and inspection of businesses and facilities at KCIA to verify that they comply with applicable regulations and best management practices. In addition to this work, from 2004 – 2007 the Boeing Company removed approximately 89,000 linear feet of PCB-contaminated concrete joint material from North Boeing Field and in 2010 they removed an additional 3,900 linear feet of this material from the northern area of the property.

Remaining high priority source control actions are either ongoing or planned for completion in 2011. Sediment trap sampling and testing is an ongoing activity that is expected to continue subject to funding and staffing limitations. Ecology will continue the process of conducting a Remedial Investigation/Feasibility Study (RI/FS) for the North Boeing Field/Georgetown Steam Plant. Identification and cleanup of contaminant sources to Slip 4 and the LDW will continue to be the highest priority of the RI/FS. Source control actions planned for completion in 2011 include:

- Source tracing at KCIA;
- Fill data gaps identified by the characterization of the Georgetown Steam Plant property;
- Characterization of extent of PCBs in concrete joint material and removal of contaminated joint material at North Boeing Field;
- Characterization of contaminated soil and groundwater in the Propulsion Engineering Laboratory area of North Boeing Field;
- Cleaning and video inspection of storm drain structures and lines at North Boeing Field (99% complete in 2010);
- Source tracing in the north lateral storm drain line at North Boeing Field; and
- Implementation of interim actions as needed on the North Boeing Field and Georgetown Steam Plant Properties. (Removal of PCB-contaminated soil is currently planned for the 2011 construction season.)

In addition to these actions, USEPA and the Boeing Company implemented short-term stormwater treatment on the North Lateral Storm Drain at North Boeing Field on September 15, 2010. Ecology will work collaboratively with USEPA and the Boeing Company to review data from the current short-term stormwater treatment system and to determine the needs for long-term stormwater treatment.

These additional source control actions are expected to minimize the most significant risks for recontamination of Slip 4 from currently identified sources of contaminants. However, there are some potential uncertainties that have been identified that will need to be addressed. These include:

- Re-routing of the King County storm drain line from upstream of the NBF north lateral to a location downstream of the King County Lift Station creates a new source control data gap. Sampling and testing of stormwater and storm drain solids will be completed during the 2010-2011 wet season to evaluate the recontamination potential from rerouting the King County storm drain line.
- 8th Avenue Terminals (Crowley) has proposed installation of a new stormwater line that would discharge to the head of Slip 4. The site owner will be required to meet City of Seattle and Ecology discharge requirements and to demonstrate that the discharge will not recontaminate Slip 4 sediments.
- Contaminants are present in bank soils at Slip 4; however the soils will be managed as part of the Slip 4 remediation and capped to prevent future releases. The cap has also been designed to prevent releases of PCB-contaminated pore water or groundwater to

Slip 4. Groundwater up gradient from the Slip 4 bank on the 8th Avenue Terminals site will be characterized under a MTCA Agreed Order by Ecology to determine if groundwater from this site could represent an ongoing source of Slip 4 sediment recontamination.

- Insufficient information is currently available to assess the potential for Slip 4 sediment recontamination with chemicals other than PCBs (i.e., metals, PAHs, phthalates). Additional data will be collected during the 2010-2011 wet season to determine the effectiveness of short-term stormwater treatment in removing these chemicals from stormwater.

Addressing the remaining high priority source control actions, implementing long-term stormwater treatment, and addressing the remaining uncertainties will minimize the potential for recontamination of the head of Slip 4 following cleanup. Ecology, in collaboration with USEPA, has determined that source control activities implemented to date are sufficient to allow sediment cleanup at the head of Slip 4 to be initiated in 2011.

Sincerely,

Robert W. Warren, Section Manager
Toxics Cleanup Program
Northwest Regional Office

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